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March 16, 1993

Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street N. W.  
Washington, D. C. 20554

Re: Reply Comments of Austin, TX  
et al., MM Docket No. 92-266

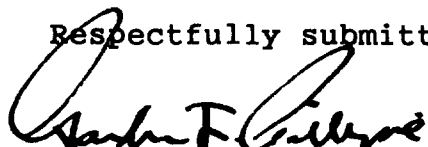
Dear Ms. Searcy:

I write only to correct a serious and personally offensive mischaracterization by Nicholas P. Miller and Joseph Van Eaton, counsel for Austin, Texas, et al., in their Reply Comments. On pages 23 and 24 of their Reply Comments, Messrs. Miller and Van Eaton assert that I argued that the costs of providing service "are 'unusually' high both for operators serving small, rural communities and for operators serving big cities." Though cute, the characterization is false.

In our meetings at the Commission on behalf of Prime Cable, we did not argue that Prime faces "greater-than-average costs of providing service in these large cities" -- Anchorage, Houston, Las Vegas, and Chicago -- as Messrs. Miller and Van Eaton would have the Commission believe. Austin Reply Comments at 23. We did emphasize the special problems faced by systems in Alaska, as well as noting some of the characteristics of other large stand-alone systems in major markets. Except for Alaska, Prime has not argued for any "variances" in benchmark treatment.

If the other arguments presented by counsel for Austin bear the same level of accuracy as their contentions discussed above, I hope the Commission will discount them accordingly,

Respectfully submitted,

  
Gardner F. Gillespie

GFG:dj

cc: Nicholas P. Miller, Esq.  
Joseph Van Eaton, Esq.

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